

# EXHIBIT C



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March 18, 2023

**VIA E-MAIL**

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Re: *Ecolab et al v. Ridley and ChemTreat*  
Docket No: 1-22-CV-00050

Counsel:

We are in receipt of your March 14, 2023 Objections to Plaintiffs' Request to Inspect Ridley's Devices including Plaintiffs' request to inspect and forensically copy certain electronically stored information in Ridley's possession.

**A. Ridley's Objections Are Misplaced**

Plaintiffs' objections to Plaintiffs' Request for Inspection lack merit. As a general matter, forensic imaging "is not uncommon in the course of civil discovery." *John B. v. Goetz*, 531 F.3d 448, 459 (6th Cir. 2008) (citing *Balboa Threadworks v. Stucky*, No. 05-1157-JTM-DWB, 2006 WL 763668, at \*3 (D. Kan. Mar. 24, 2006)). In fact, federal courts "have assumed that the provisions of Rule 34(a) concerning inspection, copying, and testing of tangible objects are sufficient to authorize a court to order reproduction of an entire hard drive using the 'mirror image' method." *Diepenhorst v. City of BattleCreek*, No. 1:05-cv-734, 2006 WL 1851243, at \*2 (W.D. Mich. June 30, 2006) (citing *Simon Property Group, LP v. MySimon, Inc.*, 194 F.R.D. 639, 640-41 (S.D. Ind. 2000)).

For each of Plaintiffs' requests, Ridley largely provides the same objections. Ridley claims that any information sought after March 18, 2022 is irrelevant because Ridley's last day of employment with ChemTreat was March 18, 2022. Plaintiffs disagree with this assertion. The

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relevant time period includes information through the present because Plaintiffs are entitled to access data that may have been modified or altered between Ridley's last day of employment and today's date. Such a limitation on the documents requested is unreasonable. The parties have also not agreed to such a limited time frame for any of the other discovery in this case.

Ridley also objects to each request because "Ridley has complied with his discovery obligations and any alleged deficiencies have been resolved by motion to compel practice and a resultant order." This is not a proper objection. The Rule 34 request was propounded on February 13, 2023, and is discovery that is not the subject of any pending motion to compel. Ridley cannot claim he has now – after the court ordered him to fully respond to other discovery requests – complied with all discovery in perpetuity.

Ridley also asserts that because Ecolab "spoliated the central evidence in this dispute when Ridley returned the Nalco/Ecolab issued laptop and LaCie drive to Nalco/Ecolab per its instructions, which deprived Ridley of exonerating evidence." (Letter at 4.) This objection is meritless. First, Ridley's initial counsel has an image of Ridley's external hard drive that Ridley used to back up his Ecolab computer. Ridley himself is in possession of the evidence he claims was spoliated. In any event, even if there were any issues of spoliation, Ridley's claim is no basis for an objection to Plaintiffs' legitimate discovery request. The discovery rules "do not permit one party to condition his discovery obligations on the other party's discovery responses." *Grant v. Target Corp.*, 281 F.R.D. 299, 313 (S.D. Ohio 2012) (quoting *Moses v. Sterling Commerce (America), Inc.*, No. Civ.A. 2:99-CV-1357, 2003 WL 23412984, \*3 (S.D. Ohio July 1, 2003)). Ridley's assertion that Plaintiffs are allegedly deficient in their discovery obligations is irrelevant to Ridley's obligation.

Ridley also claims that because there are no specific allegations about his personal cellphone, iCloud backup, or related requests, he is not required to produce any information on his personal cellphone. This also lacks any foundation in law or logic. Plaintiffs may request discovery from numerous sources even if those specific sources are not outlined specifically in a Complaint or Answer. *See Fed. R. Civ. P. 34.*

Ridley further argues that because Plaintiffs' expert has confirmed that the Digital Guardian Report contains more than sufficient amount of information for him to conclude that Ridley misappropriated thousands of Ecolab files, he is under no further discovery obligations. The ample evidence of certain misconduct does not preclude Plaintiffs from discovery as to the extent of Ridley's transgressions and to locate the thousands of files that Ridley downloaded and then deleted from his Ecolab OneDrive.

Plaintiffs submit that the inspection and forensic copying requested is necessary to identify the full extent of Ridley's theft and misappropriation. The Digital Guardian report contains indisputable evidence that Ridley possessed Ecolab data within Ridley's **personal** Microsoft email and OneDrive account. ChemTreat identified the fact that Ridley sent Ecolab data from Ridley's personal Microsoft account to Ridley's former ChemTreat email account, which ChemTreat claimed as the basis for terminating Ridley. Plaintiffs cannot have full knowledge of Ridley's actions, including whether he deleted or otherwise manipulated certain data on his personal devices without proceeding with the forensic imaging of the devices. The value of the exfiltrated thousands

of files must exceed the cost to image and analyze Ridley's personal devices and accounts, and it is entirely Ridley's fault that he exfiltrated and then later used the exfiltrated Ecolab information while employed at ChemTreat.

Please withdraw your baseless objections.

## **B. Proposed Inspection and Analysis**

Plaintiffs appreciate Ridley's assertions that some of the devices and information requested may contain either privileged or personal information that is irrelevant to the lawsuit. In an effort to compromise, Plaintiffs propose the following parameters for the inspection and forensic analysis:

- Sources of Information: Plaintiffs' request to forensically image and search the following:
  - Ridley's personal iPhone 13, serial number \_\_\_\_\_.
  - All iCloud mobile backups of Ridley's personal iPhone 13, serial number \_\_\_\_\_.
  - Ridley's laptop computer, serial number \_\_\_\_\_.
  - Ridley's Western Digital model My Book, serial number \_\_\_\_\_, external USB drive.
  - Ridley's AmazonBasics serial number 180129000600, external USB drive.
  - Ridley's Microsoft email account data associated with the email address [aridley75@hotmail.com](mailto:aridley75@hotmail.com)
  - Ridley's Microsoft OneDrive account data associated with the email address [aridley75@hotmail.com](mailto:aridley75@hotmail.com).
  - Ridley's Google [anthony.ridley22@gmail.com](mailto:anthony.ridley22@gmail.com) email account data.
  - Ridley's Google Drive data associated with the email address [anthony.ridley22@gmail.com](mailto:anthony.ridley22@gmail.com).
  - Ridley's DropBox account data associated with the email addresses [aridley75@hotmail.com](mailto:aridley75@hotmail.com) or [anthony.ridley22@gmail.com](mailto:anthony.ridley22@gmail.com).

(Collectively referred to as "Sources").

- With respect to the search, Plaintiffs propose the date range and keywords identified on Exhibit A which is attached to this Letter. Plaintiffs propose that the date range and keywords shall be utilized as the scope of the permitted search of any electronic data.
- Defendant's counsel, or a representative, shall deliver the Sources to the agent for computer forensic company Tyger Forensics, Inc. ("Tyger") at 53 West Jackson Blvd, Suite 609, Chicago Illinois 60604.
- Tyger will then create a forensic image of the Sources to a newly purchased hard drive. A second forensic image of the Sources will be created as a backup immediately following the creation of the first forensic image. The Sources will then be returned Defendant's counsel, or a representative. Tyger shall not alter the contents of the Sources in any way. A third working copy of the Sources will then be created and examined by

the technicians at Tyger with its contents identified and categorized.

- Plaintiff's counsel, or a representative, shall deliver the screen lock password for Ridley's Apple iPhone 13 to Tyger. Ridley may change his Apple iPhone 13 screen lock password to a temporary password before providing that temporary password to Tyger. A representative of Tyger will call Ridley after the collection of the iPhone is complete so that Ridley may change his screen lock code to a screen lock code only known by Ridley.
- Plaintiff's counsel, or a representative, shall deliver the password for Ridley's Apple iCloud account to Tyger. Ridley may change his Apple iCloud account password to a temporary password before providing that temporary password to Tyger. At the time of collection, Ridley will immediately email Tyger any two factor codes required to access the iCloud account. A representative of Tyger will call Ridley after the collection of the iCloud account data is complete so that Ridley may change his temporary password to a password only known by Ridley.
- Plaintiffs propose that the parties develop and agree upon search terms reasonably calculated to lead to admissible evidence, such as the names of specific files Ridley exfiltrated.
- Plaintiff's counsel, or a representative, shall deliver the password for Ridley's [aridley75@hotmail.com](mailto:aridley75@hotmail.com) email account to Tyger. Ridley may change his [aridley75@hotmail.com](mailto:aridley75@hotmail.com) email account password to a temporary password before providing that temporary password to Tyger. At the time of collection, Ridley will immediately email Tyger any two factor codes required to access the email account. A representative of Tyger will call Ridley after the collection of the aridley75@hotmail.com Forest Ridge email account and OneDrive data is complete so that Ridley may change his temporary password to a password only known by Ridley.
- Plaintiff's counsel, or a representative, shall deliver the password for Ridley's [anthony.ridley22@gmail.com](mailto:anthony.ridley22@gmail.com) email account to Tyger. Ridley may change his [anthony.ridley22@gmail.com](mailto:anthony.ridley22@gmail.com) email account password to a temporary password before providing that temporary password to Tyger. At the time of collection, Ridley will immediately email Tyger any two factor codes required to access the email account. A representative of Tyger will call Ridley after the collection of the [anthony.ridley22@gmail.com](mailto:anthony.ridley22@gmail.com) Forest Ridge email and Google Drive account data is complete so that Ridley may change his temporary password to a password only known by Ridley.
- Plaintiff's counsel, or a representative, shall deliver the password for Ridley's DropBox account to Tyger. Ridley may change his DropBox account password to a temporary password before providing that temporary password to Tyger. At the time of collection, Ridley will immediately email Tyger any two factor codes required to access the DropBox account. A representative of Tyger will call Ridley after the collection of the DropBox data is complete so that Ridley may change his temporary password to a password only known by Ridley.

- Tyger, at the direction of Plaintiff's counsel, will perform an analysis of the Sources using the forensic images to report on such activities as file creation, file printing, email creation, receipt and sending, file copying and deletion. Reports generated by Tyger will be provided to both Plaintiff's counsel and Defendant's counsel by email. The costs of the imaging, analysis, examination, reporting, testimony and all billable activities performed by Tyger, shall be split 50-50 by Plaintiffs and Ridley.
- To the extent any privileged documents are inadvertently produced, Ridley's counsel may rely on the appropriate clawback procedures in the Court's Protective Order to retrieve any produced documents.
- If any data exists but does not fall within the scope of production as identified above by the keywords need not be produced. However, that electronic data must be maintained so that if a dispute arises at a later point in time about whether that data should or should not be produced in accordance with the Court's local rules, the Federal Rules of Civil Procedure, and any applicable federal or state law, the preserved data can be identified.
- Plaintiffs propose the date of inspection to be on or before **Friday, March 24, 2023**.

Should you wish to discuss this proposal, please contact me at your earliest convenience.

Sincerely,

FISHER & PHILLIPS LLP

/s/ J. Gregory Grisham

J. Gregory Grisham

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## EXHIBIT A

I. Date Range: 08/01/2020 12:00AM EDT – 03/18/2023 11:59PM EDT

II. Key Terms:

“ADM - Southern Cellulose”  
“Alstom Sodexo”  
“Arnold’s Airforce Base”  
“Arnold Airforce Base”  
“Arch Plastic”  
Bunge  
Cargill  
Caertainteed  
Coca-Cola  
Conagra  
“Country Delite”  
Duracell  
“Erlanger Health Systems”  
“General Mills”  
“Georgia Pacific”  
Hexcel  
“IAC Dayton”  
“International Paper”  
Knauf  
La-Z-Boy  
M&M  
“Masterfoods USA”  
“Mayfield Dairy”  
“Nucor Tubular Products”  
“Pilgrims Pride”  
Smurfit-Stone  
“Southeastern Container”  
“SRI Surgical”  
“Supreme Resources”  
“The Chattanooga”  
“TVA”  
“University of Tennessee”  
Volkswagen  
AGC  
“Auburn University”  
“Berry Plastics”  
“Brown Mechanical”  
“Buffalo Rock”

“Embassy Suites”  
“Frito Lay”  
“Heritage Plastics”  
Homeyer  
IAC  
JLL  
Kamtek  
“LP Hanceville”  
Magotteaux  
Marriott  
Mercedes  
MGA  
“Mitchell Plastics”  
“Nordic Cold Storage”  
NTS  
“OK Foods”  
“One Stop Environmental”  
“Pilgrim’s Pride”  
Rehau  
Remington  
“Ridge Park”  
“Riverchase Galleria”  
UAB  
“University of Alabama”  
“US Gypsum”  
“Voestalpine Automotive”  
WKW  
Yorozu  
“WL121 District”  
“George A Dickel”  
Pepsi  
“River Valley Ingredients”  
“shaw Ind”  
“Stevison Ham”  
“Tate Lyle”  
“Tennessee Tanning”  
Toray  
Tyson  
“U. Of Tennessee”  
VI-Jon  
Nalco  
Ecolab  
"bridge by components"  
"bridge plantemplate"  
"district bridge data"  
"region bridge"

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playbook  
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scorecard  
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duracell - cell make - cooling tower - 7daynalco3  
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duracell - mouse creek back boiler inspection  
duracell 12-17-02 tasso.doc  
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duracell 7.23.04 mouse creek.doc  
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pmw - duracell intl - (coppertop)- cleveland, tn -nw54 -7-1-07.xls  
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